

SASA
POLYESTER SAN. A.Ş.



SASA POLYESTER IND. INC.

**Additional Polymer Chips and Polyester (Fibre/MTR)
Production Facilities (CP11 – CP12 – CP13) and Auxiliary
Facilities (Wastewater Treatment Plant, Storage and Thermal
Power) Capacity Increase Project**

Stakeholder Engagement Plan (SEP)

(Plan no: SASA-PLN-SOC-001)

April 2024

MCS
PROJE MÜŞAVİRLİK MÜHENDİSLİK
TİCARET LTD. ŞTİ.

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1 INTRODUCTION

1.1 Background

SASA Polyester Inc. (hereinafter called as “SASA” or “Project Owner”) is planning to realize the Additional Polymer Chips and Polyester (Fibre/MTR) Production Facilities (CP11 – CP12 – CP13) and Auxiliary Facilities (Wastewater Treatment Plant, Storage and Thermal Power) Capacity Increase Project in Adana Province, Seyhan District, Sarihamzalı Neighborhood.

By establishing new fibre (CP11 and CP13) and Pet Chips (CP12) production facilities in addition to the fibre and polymer enterprises (from CP1 to CP10), which are currently being produced by SASA, apart from the investments that are currently at operation and under construction; It is planned to increase the production capacity of fibre and pet chips (textile and bottle chips type). In this context, it is planned to establish a new fibre facility called CP11 with a capacity of 1100 tons/day, which also includes a CP13 new fibre line with a capacity of 100 tons/day. With the polymer obtained, 1150 tons/day of mono, bico, colored and low melt fibre will be produced. In addition, optionally, 700 tons/day of textile chips can be produced.

Besides the CP11 and CP13, a new pet chips production facility called CP12 with a capacity of 1050 tons/day is also planned to be established. The obtained polymer will be used in the production of 900 tons/day PET resin bottle chips or 1050 tons/day PET textile and/or film chips.

Moreover, it is planned to add a steam boiler to meet the needs of the existing SASA facilities. Besides, it is planned to remove the domestic and industrial wastewater treatment plant located within the existing operational boundaries of SASA and to construct a central wastewater treatment plant for both the planned Fibre-Pet chips production facilities, the existing businesses, and the planned PTA production facility.

This Stakeholder Engagement Plan (SEP) has been produced to contribute to the studies conducted to assess the Environmental and Social Impacts of the Project as per the IFC Performance Standards (IFC PSs). The SEP was prepared for the construction and operation phases of the project in line with IFC PS 1 requirements. The SEP identifies target groups and the specific range of engagement activities required for each group.

1.2 Project Description

The Project is located in Seyhan District of Adana Province at the East Coastal Mediterranean Region of Turkey.

The Area of Influence (AoI) for the social topics assessed in the ESIA Report is determined based on the following factors:

- Proximity of the settlements to the Project site and its components,
- Neighbourhoods with landlords of the Project site.

Regarding the mentioned factors, the settlements fall within the social scope of this report are Büyükdikili, Gölbaşı, Kavaklı, Küçükdikili, Sarıhamzalı, Mekan, Söğütlü, Yeşiloba, Sarıhuğlar and Yolgeçen Neighbourhoods. The distances of the mentioned settlements to the Project site are given in Table 1.1.

Table 1.1. The Settlements around the Project Area

Name of the Settlement	Distance to Project Area (m)
Sarıhamzalı Neighbourhood	1566
Kavaklı Neighbourhood	1296
Yolgeçen Neighbourhood	1617
Küçükdikili Neighbourhood	1758
Mekan Neighbourhood	1075
Söğütlü Neighbourhood	1310
Gölbaşı Neighbourhood	3130
Yeşiloba Neighbourhood	3752
Büyükdikili Neighbourhood	3366

The neighbourhoods in the scope of this social study and the distances of nearest sensitive receptors are given in Figure 1.1 below.

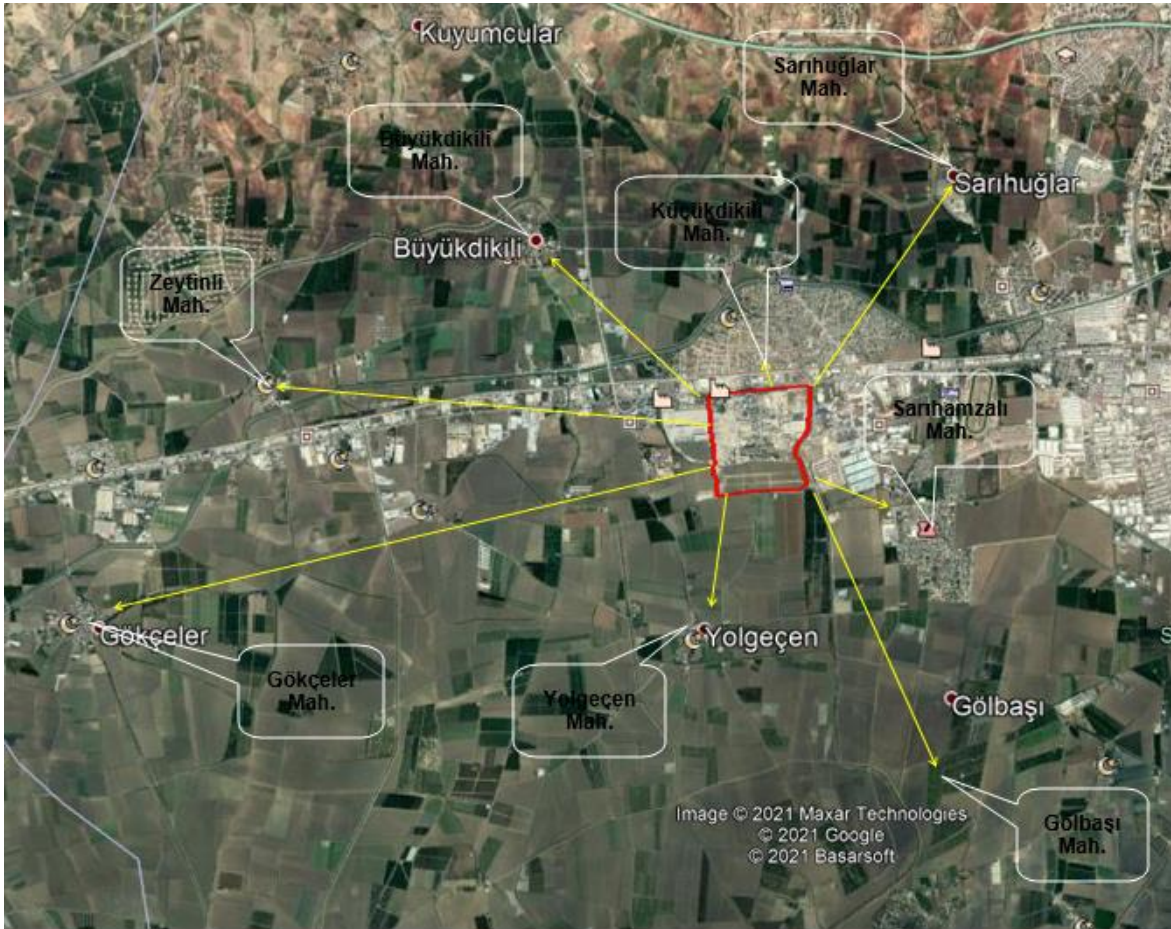


Figure 1.1. Social Study Area

The EIA report was prepared and submitted to Ministry of Environment, Urbanization and Climate Change and final EIA Positive report was obtained.

1.3 Scope

This document is applicable to all activities resulting from the Project, including those associated facilities and all Contractors during both construction and operational phases of the Project. All Contractors shall work in compliance with the related requirements and standards that have been set out in this Plan, after getting approval by SASA.

1.4 Purpose

The purpose of this document is to identify all stakeholders and their interests to the Project and to lay out the procedures and principles to be applied during engagement with the stakeholders.

The purpose of this Plan is:

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- Identifying all stakeholders and their interest to the Project,
- Defining the scope of stakeholder engagement and setting out applicable management interfaces,
- Defining roles and responsibilities,
- Outlining the applicable Project Standards relevant to this Plan,
- Defining Project commitments and procedures relevant to this Plan,
- Defining monitoring requirements of stakeholder engagement activities and
- Defining training requirements,
- Setting out references for supporting materials and information.

This Plan aims;

- To define stakeholders,
- To describe the most effective methods by:
 - Keeping the management of construction and operation fully informed on the issues related to external affairs and concerns,
 - Establishing an environment in which engagement capacities and cultural norms of each relevant group shall be respected within the scope of methods to be developed for comprehending stakeholder issues and concerns, and
 - understanding the concerns of stakeholders and establishing fair, transparent and clear dialog with them based on their concerns.
- To establish long term relations between SASA and local communities based on mutual trust and transparency,
- To ensure that stakeholders have access to information on the Project, investments, construction works and operation activities in a timely manner and that disclosed information and data are fully understandable for the targeted groups and that access to consultation locations is available for all,
- To ensure vulnerable groups have been identified and these groups have been included in ongoing consultation and engagement process and,
- To ensure that all relevant parties have been engaged and no group has been excluded.

1.5 Definitions

- **Project Affected People:** Any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land

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(residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

- **Stakeholder:** Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.
- **Transparency:** All the grievances are considered in the scope of the grievance procedure in a clear and understandable manner.
- **Impartiality:** A fair and equal grievance procedure will be applied for every complaint or concern submitted by individually or as a community.
- **Confidentiality:** Anonymous complaints can be submitted and resolved. Raising a complaint will not require personal information or physical presence.
- **Accessibility:** All employees and stakeholders can raise a comment or submit a grievance easily.
- **Culturally Appropriate:** A complaint or an issue raised by local communities are considered in the manner of regional concerns and convenient resolution process will be taken.
- **Vulnerable People:** People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

1.6 Abbreviation

AoI	Area of Influence
CR	Community Relations
CRF	Complaint Register Form
DCC	Document Control Center
GMP	Grievance Mechanism Procedure (External)
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSS	Environmental, Health and Safety and Social
EIA	Environmental Impact Assessment
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety and Environment
ICP	Informed Consultation and Participation
IFC	International Finance Corporation
KPI	Key Performance Indicator
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
OHS	Occupational Health and Safety

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PAP	Project Affected People
PPM	Public Participation Meeting
PS	Performance Standards
SASA	SASA Polyester A.Ş.
SEP	Stakeholder Engagement Plan
SRS	Social Responsibility Staff

2 KEY PRINCIPLES, ROLES AND RESPONSIBILITIES

The SEP will be implemented by relying on the following key principles for all the Project related comments, issues and complaints internally and externally.

2.1 Roles and Responsibilities

Principal roles and responsibilities for the implementation of this plan are outlined below:

Table 2.1. Key Roles and Responsibilities

Roles	Description and Responsibilities
General Manager	Approves this Plan Ensures that this SEP implemented Determines policies and targets Appoints the Management Representative and ensures the Management Representative is aware of his / her responsibilities Evaluates the reports provided by Management Representative and ensures necessary actions were taken Provides necessary resources for proper implementation
Construction Manager / Project Manager	Coordinates with parties for proper implementation of this SEP Makes periodic inspections of the performance of Contractors of its operations during the construction phase Reports to the General Manager about system performance Ensures national and international legislations / guidelines which are applicable to the Project activities are identified and tracked Works in cooperation with other departments in order to determine targets for Environmental, Social and HS and resource efficiency issues Determines the project info and social budget of the project Making the final decision concerning internal / external grievances (if needed) in the light of the assessments of Social Responsibility Staff and HSE Manager

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<p>Social Responsibility Staff (SRS)</p>	<p>Implements the Plan</p> <p>Keeps the records of the complaints / suggestions in the Grievance Database with details (raised by who, date, status etc.)</p> <p>Supports HSE Manager on the first evaluation of the relevance of grievances collected</p> <p>Shows best efforts to resolve all complaints in one month</p> <p>Provides regular reporting back to the community on the management related to community grievances</p> <p>Records all formal and informal engagement activities with local communities in Stakeholder Management System</p> <p>Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports</p> <p>Monitors and records the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports</p> <p>Forms relationships with the Project stakeholders</p> <p>Organizes stakeholder meetings to collect the responses to grievances actively as required</p> <p>Gives the feedback to the stakeholders about the results of their grievances through External Grievance Form within 30 calendar days (complainants who have provided their names and contact info will be notified within 5 days that the grievance solution process has started and after the grievance closed).</p>
<p>Health Safety and Environment (HSE) Department</p>	<p>Determines the national and international legislations that are applicable to the Project activities and informs the Operation / Project Manager</p> <p>Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances</p> <p>Ensures that all provisions in the Contractor engagements regarding environment, social and HS requirements as per the project standards during the construction stage and to audit the performance of the Contractors</p> <p>Determines and provides the necessary training materials for employees</p>

	<p>Provides answers to the OHS, environment and social grievances raised by employees, the local community and local institutions</p> <p>Helps SRS for keeping the record of the complaints / suggestions in the Grievance Database with details</p> <p>Supports SRS on the first evaluation of the relevance of grievances collected</p> <p>Supports SRS for recording all formal and informal engagement activities</p> <p>Conducts internal audits / site audits</p> <p>Determines corrective measures if necessary</p> <p>Identifies the need for OHS and Environmental trainings</p> <p>Checks the Environmental records and performance reviews of Contractors</p> <p>Examines the HSE response plans and preparations</p> <p>Monitors the permits and notices regarding OHS and Environment and ensures that the necessary permits are obtained</p>
<p>Contractors / Subcontractors</p>	<p>Contractors / Subcontractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence</p> <p>Follows the rules listed in this SEP and other relevant Management System documentation of SASA.</p>

3 PROJECT STANDARDS

The national legislations and international standards that the Project must conform to are listed in the REFERENCES section of this SEP.

4 STAKEHOLDER ENGAGEMENT

4.1 Early Engagement

The e-mail address and telephone number are presented on the website of SASA (www.sasa.com.tr)

The communication / consultation form is presented on the website of SASA. External grievance forms will be distributed in public places as well, presented as Appendix A.

Within the scope of the project, in accordance with Article 9 of the "EIA Regulation" published in the Official Gazette dated 25.11.2014 and numbered 29186, A "Public Participation Meeting" was held in Sarıhamzalı Neighbourhood on 30th June 2020 at 10.30 in the market place of the neighbourhood in order to ensure public participation in the EIA process, to inform about the activity, to receive their opinions and suggestions. Local and national newspapers were used for the announcement of the details of the meeting. Residents from local communities, representatives of SASA and authorities from Adana Provincial Directorate of Environment and Urbanization were participated to the meeting. The meetings comprised of presentation includes the Project information and record of comments and suggestions.

5 STAKEHOLDER IDENTIFICATION

All stakeholder groups that have an interest in, that might be affected by, or that might have an influence on the outcome of the Project were identified during the early engagement of the Project. Stakeholder identification was completed and involved screening a wide array of potential stakeholders, including institutions, associations, NGOs and other informal groups, that should be involved in the engagement process.

The stakeholders were then classified according to their type and status based on the profile that the stakeholder has within the social structure of the context.

The relevant stakeholder groups are presented in Table 5.1 below:

Table 5.1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type	
	Affected	Interested
Local Communities		
Mukhtars and residents of <ul style="list-style-type: none"> • Sarıhamzalı Neighbourhood • Yolgeçen Neighbourhood • Mekan Neighbourhood • Söğütlü Neighbourhood • Kavaklı Neighbourhood • Küçükdikili Neighbourhood • Yeşiloba Neighbourhood • Gölbaşı Neighbourhood • Büyükdikili Neighbourhood • Sarıhuğlar Neighbourhood 	✓	✓
Government		

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Stakeholder Groups	Stakeholder Type	
	Affected	Interested
<ul style="list-style-type: none"> Adana Provincial Directorate of Environment and Urbanization Adana Provincial Directorate of Agriculture and Forestry Seyhan District Governor 6th Regional Directorate of State Hydraulic Works 	✓	✓
Municipality		
Seyhan Municipality Adana Metropolitan Municipality	✓	✓
Media		
<ul style="list-style-type: none"> Adana Gazete Adana Haber Adana Medya Doğu Akdeniz'den Doriga Ekspres Gazetesi Gazete Adana İdealist Gazetesi Yeni Adana Yenigün Gazetesi 	✓	✓
NGOs		
<ul style="list-style-type: none"> Seyhan Chamber of Agriculture Adana Chamber of Industry Çukurova Development Agency 	✓	✓
Private Sector		
<ul style="list-style-type: none"> TEMSA Adana Recycler Site Pilyem Gıda A.Ş. 	✓	✓

6 STAKEHOLDER ENGAGEMENT PROGRAM

The objectives of external communications are to provide continuous engagement with targeted audiences to inform about the company activities, including company performance, company development and investment plans and their implementation.

The methods of communication to be utilized by the SASA are summarized in the following Stakeholder Engagement Program and will include:

- Publication for public review of the Stakeholder Engagement Plan, Non-Technical Summary and Environmental and Social Action Plan;
- Meetings with regulatory bodies;
- Public meetings;
- Published on local municipalities' website (if available) and/or on a dedicated SASA's website;

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- Announcements in local media;
- Provision of general information on noticeboards at key public locations.

The following table summarizes the stakeholder engagement program in terms of:

- Activity / project;
- Type of information disclosed;
- Location and dates of meetings / forms of communications;
- Stakeholder groups consulted.

In this respect, the following the stakeholder engagement program is developed accordingly.

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Table 6.1. Stakeholder Engagement Program

ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
SEP 1	-All affected settlements and Interested parties -Local communities -Local government -Local business	Information Disclosure -Purpose, start date, duration, and nature of construction and operations activities -Status and effectiveness of implementation of mitigation measures related to relevant social and environmental impacts -Closure options and impacts on local communities -Grievance mechanism disclosure - Ongoing monitoring objectives and activities, and regular reporting back to stakeholders on monitoring results - Continue disclosing information via SASA website	Dependent on stakeholder classification	Prior to Construction, reviewed for updates every 2 years Annual As requested / as needed	SRS
SEP 2	-All affected settlements and Interested parties -Local communities -Local government -Local business	External Grievance Mechanism -Disclosure of grievance mechanism to communities -Disclosure of grievances received and resolved to communities	Dependent on stakeholder classification	Prior to Construction, reviewed for updates every 2 years Annual As requested / as needed	SRS
SEP 3	-Local businesses -All affected settlements and mukhtars -Project Workers	Employment and Procurement Strategies -Recruitment of employees -Training of staff -Procurement of supplies and services	Dependent on stakeholder classification	Prior to Construction and operation, reviewed for updates every 2 years	SRS

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ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
	-Ministry of Labour and Social Security			Annual As requested / as needed	
SEP 4	-All affected settlements and Interested parties -Local communities -Local government -Local business	Use of Emergency Response and Preparedness -Provision of information on code compliance / emergency preparedness to engage in public consultation and disclosure about issues of concern with potentially affected stakeholders. -Provision of information on code compliance / emergency preparedness to develop appropriate emergency response strategies and capabilities with potentially affected stakeholders.	Drills Workshops Community meetings	Annual drills or as required	HSE Department SRS
SEP 5	NGOs	Social progress, economic and social development and environmental protection Provision of information on: -Mitigation measures against potential environmental and social risks -Sustainability criteria -Social responsibility projects, implementation principles -Cumulative impacts of project in the region	Focus group meetings Workshops Company website	As required / As requested	SRS
SEP 6	-All affected settlements and mukhtars -Adana Municipality	Road Transportation -Road safety awareness, including on safe crossing of the bypass and access roads	Face to face meetings	At least annually. As requested / as needed	SRS

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ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
	-Seyhan Municipality	<ul style="list-style-type: none"> -Types, number and frequency of vehicles that can be anticipated through different phases of the Project -Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children are present. -Collaborating with local communities on education about traffic and pedestrian safety (e.g. school education campaigns) -Communication of traffic measures and Project road usage with muhtars 	Dependent on stakeholder classification		
SEP 7	<ul style="list-style-type: none"> -All affected settlements and mukhtars -Adana Metropolitan Municipality -Seyhan Municipality 	<p>Management of environmental and social risks of the Project</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> -Environmental monitoring program -Environmental monitoring results - Overall information about progress of the Project -Cumulative impacts in the region 	<ul style="list-style-type: none"> Meetings with Mukhtars Brochures Workshops 	As required / As requested	SRS
SEP 8	Vulnerable Groups	<p>Employment and any other interest of vulnerable groups</p> <p>Provision of information on:</p> <ul style="list-style-type: none"> - Recruitment of employees -Training of staff -Use of roads, water and other infrastructure, increase in traffic density -Local employment 	<ul style="list-style-type: none"> Meetings targeting any identified vulnerable groups Women meetings Focus group discussions 	<ul style="list-style-type: none"> At the beginning of the construction and operation As requested / as required 	SRS

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ID	Target Group	Purpose of Engagement and Engagement Topics	Method of engagement	Frequency	Responsible
		-Important commercial opportunities -Environmental impacts	NTS		
SEP 9	-Workforce -All affected settlements and mukhtars -Adana Municipality -Seyhan municipality -Local government	Community Health -Provide training on Company policies (employees and contractors) on respectful and appropriate behaviour with communities -As part of Project orientation training, include awareness raising of the prevention and treatment of communicable diseases. -Work with women in the communities to help prevent and manage communicable diseases, particularly due to women’s primary role as caretakers of ill family and community members, and due to their vulnerability and their productive and reproductive roles.	Face to face meetings Dependent on stakeholder classification	At least annually. As requested / as needed	SRS
SEP 10	SASA and Project Contactor employees	Employee welfare Provision of information on: - Employee Grievance Mechanism -Labour rights -OHS procedures -Contractor management	Face to face interview OHS Committee Labour audits	Monthly or when required due to the results of grievance mechanism	SRS (Contractor SRS will conduct and face-to-face meetings with contractor employees.)

7 TOOLS & METHODS FOR INFORMATION DISCLOSURE DURING CONSTRUCTION AND OPERATION OF THE PROJECT

SASA will provide transparent informative material in a consistent and timely manner to the affected communities and the remaining stakeholders. The manner in which this material will be disclosed is discussed in the sections that follow.

7.1 Internal / Web Site

SASA will keep information on the Project updated on their website in both Turkish and English. The homepages of the website can be found here:

www.sasa.com.tr

7.2 Information Sheets

Information sheets including a non-technical summary of the Project, key project issues and details regarding SASA's approach to minimizing, mitigating and managing potential negative impacts will be prepared and made available on the SASA websites and at the Project construction site offices. Copies of these information sheets will be posted at the mukhtar offices of the affected communities identified as stakeholders.

7.3 Responding to Local Communities and Publications for People

Authorities of the Project will give full and timely responses to requests, comments and questions of local communities in addition to implementing the grievance procedure in the case of complaints. All requests shall be treated respectfully. In the event it is not possible to meet a particular request, then a detailed explanation as to why not, will be given through the use of social plans.

At the SASA website, material providing information about different stages of the project will be available, and stakeholders will be kept posted.

When needed, particular matrices and informative documents will be prepared as a response to concerns, complaints and requests of stakeholders and local communities on the basis of impact assessment surveys carried out by company. As long it is appropriate, relevant Project information will be disclosed to the public.

7.4 Disclosure Activities

During this engagement phase, disclosure and consultation activities will be designed along the following general principles:

- Consultation events and opportunities should be widely and proactively publicized, especially among Project affected parties, at least 1 week prior to any meeting via website announcements, through mukhtars, local newspaper advertisement, posted information banner in mukhtars' offices;
- The non-technical summary of the Project should be accessible (via websites) prior to any event to ensure that people are informed in advance of the meeting related to Project activities;
- The location and timing of any meetings will be designed to maximize accessibility to Project affected stakeholders, if needed transportation arrangement will be made by SASA to increase participation in meetings;
- The information presented (via presentations, leaflets, website publications etc.) will be clear and nontechnical and will be presented in the local language understood by those in the communities;
- Simplified system will be provided to ensure that stakeholders are able to raise their concerns and SASA will encourage the stakeholders to raise their concerns/complaints and suggestions; and
- Issues raised are to be answered at the meeting or, if an answer is not immediately available, these issues will be actively followed up on, the person who raised the issue will be informed after the meeting when the issues resolved.

Project related information communication meetings will be open to the entire public and will be announced through local media. Furthermore, they will be held at the locations where stakeholders (especially local communities) can easily reach like the local Mukhtar offices. If needed, separate meetings can be organized at venues frequently visited by women for women only meetings.

SASA will inform the public, via newspapers, meetings, media and other similar means, about how people can access Project related documents (such as this SEP and NTS) and the project timetable, and how they can submit comments regarding said documents.

8 MANAGEMENT OF GRIEVANCES

8.1 Grievance and Feedback Procedure

As discussed previously; grievances are complaints, suggestions and problems that employees and external stakeholders raise on a specific issue. The spectrum of grievances ranges from major and potentially illegal issues such as discrimination or victimization in the workplace to more minor day-to-day disputes of local stakeholders or Project Affective People (PAP).

Grievance procedures provide a clear and transparent framework to deal with difficulties. A grievance mechanism is a structured process that allows complainants to address disputes, fear and aspirations, concerns in a fair, easily accessible and transparent manner.


Grievance procedures will be coordinated through the appointed Social Responsibility Staff with the help of HSE Department who are the primary interfaces between the community and SASA. Complainants will have the chance to provide their names in order to gain effective feedback on their complaints/grievances, however; confidentiality procedures will be put in place to protect the complainant, as appropriate. SRS is recommended to be nominated from either Investments and Operation, Corporate Communications or Human Resources department. The SRS is expected to conduct a bridge between the firm and the employees, in order to formalize the grievance process and procedures, as it is existent, but in a non-formal way.

The grievance mechanism will be informed to the stakeholders so that they are aware of the process, having knowledge of the right to submit a grievance and understand how the mechanism will work and how their grievance will be addressed. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing or by speaking with the company SRS or HSE Department if it is not anonymous.

In addition, the mechanism shall also constitute an internal grievance process, conducted specifically for employees, subcontractors and other suppliers of SASA.

8.1.1 Principles of the Grievance Mechanism (Internal and External Grievance Mechanism)

The grievance mechanism is developed to cover the following:

-  **Simplicity and necessity:** Procedures will be kept as simple as possible, avoiding unnecessary administrative stages. Fair and transparent, informative for relevant people,

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- Keeping it up to date: The process will be regularly reviewed jointly by the SRS and the HSE Department. Regular monitoring and evaluation should be conducted continuously,
- Confidential and impartial process, non-retribution: The process will be confidential and impartial, without employees fearing retribution,
- Reasonable timescale: A certain timeframe to deliver responses and solve the problems mentioned will be followed, which is 30 days as the assigned duration for grievance resolution,
- Keeping of records: Grievances are tracked and recorded in a written manner, hard and soft copies, if possible,
- Workers should not experience retribution for raising concerns through such mechanisms.

8.1.2 Collection, Registration and Evaluation of Grievances

Handling of grievances (collection, registration and evaluation) will follow these steps:

- Initiate the grievance procedure, mainly by the SRS with the help of HSE Department;
- SRS registers the grievance/comment in the grievance database (see Appendix C);
- The SRS investigates the grievance and makes the first evaluation with the help of HSE Department;
- Final decision is made, and further action is implemented in order to solve the grievance;
- The complainant is notified (if name provided) within 5 days that the grievance solution process has started;
- The complainant is informed about the resolution (at most in 30 days after the grievance is received);
- The grievance is officially closed after related documentation is completed; and
- Anonymous complaints will not be efficient to handle; however, no one will be forced to provide names.

Depending on the type of the grievance, sharing of responsibilities should be elaborated by Corporate Communications, Human Resources, Investments and Operation and HSE Departments; however, handling and tracking should be ensured to be done mutually.

A complaint form is prepared for official notification of complaints about the project (see Appendix A). “Open door policy” shall not be encouraged as the one and only way of communication, so, reporting of complaints in writing should also be encouraged.

8.1.3 Feedback to the Stakeholders

Feedback duration on the status of the delivered grievance, is assigned as 30 days, after the receipt of the grievance. If the complainant has provided a name and contact information, this will give the chance to inform them about the status of their grievance within 5 days of grievance receipt.

It is important to monitor the on-going stakeholder engagement process to ensure that consultation and disclosure efforts are effective, and stakeholders delivering grievances have been meaningfully consulted throughout the process. It is also important to monitor to ensure that expectations are managed, and the project builds a more meaningful relationship with stakeholders. This is important in maintaining a 'social license to operate'.

The SEP will be reviewed and revised (if needed) every six months during construction phase and annually during the operation phase, while the grievance mechanism will be continuously reviewed. In addition, the project stakeholders list will be reviewed and updated.

8.1.4 Grievance Mechanism Communication

Employees should know whom they notify to in case of the event of a grievance and the support is available. Managers should be familiar with procedures. Details about the procedures should be easily available, for example in employee handbooks or flowcharted in local places.

For the collection of internal grievances from employees:

- Grievance mechanism process will be communicated with all employees (including contractor's employees) during the recruitment process and the first EHS training sessions will also include the stakeholder engagement and grievance mechanism process trainings;
- Communication about the grievance mechanism will be repeated regularly with the tool-box trainings;
- The grievance/suggestion boxes will be made available at the Project construction site offices for internal grievances; and
- All employees will be aware of the location of the grievance/suggestion boxes and how to submit their grievances (either through web site or with grievance/suggestion boxes).

For the collection of internal grievances from community:

- Grievance mechanism process will be communicated with stakeholders during stakeholder engagement meetings (including the locations of the grievance/suggestion);
- The grievance/suggestion mechanism information brochures will be shared with mukhtar offices.

The grievance mechanism constitutes two parts: External and internal (Workers, subcontractors and suppliers of SASA). These two mechanisms will have different respondents: External Grievance Mechanism will be run by the SRS and the HSE Department, while internal General Manager will be under the responsibility of different departments collaborating, such as HR, Finance, Corporate Communications and alike. A sample of the internal grievance form is presented in Appendix D.

8.2 Contact Details of SASA

SASA A.Ş.:

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Site Office:

Public Relations Representative and Board Assistant

Ayben Erdem

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9 MONITORING

9.1 Key Monitoring Activities

SASA will monitor the implementation of the stakeholder engagement process (consultations, grievance mechanism etc.). The outputs of this monitoring will also provide input on the management and monitoring of the overall environment, health and safety (labour rights) and social performance of the Project mainly through:

Stakeholder Engagement Plan (SEP)

- Revision, improvement or extension of the monitoring activities, parameters, locations and frequency; and
- Reviews and revisions of the management plans and procedures.

SASA will monitor the effectiveness of the engagement processes by analysing the feedback received from engagement activities, thus involving the engaged stakeholders into the monitoring process.

During all engagement activities, where appropriate, questions will be asked to stakeholders on the effectiveness of the meeting and the process of stakeholder engagement. These questions will be tailored for the engaged stakeholder, but will address mainly:

- Transparency and accessibility of the engagement process,
- Provision of relevant information,
- Timely responses (ongoing communication),
- Clarity and simplicity of the information provided, and
- Applicability and relevancy of the information provided.

For an effective stakeholder engagement more than 50% of the stakeholders are expected to provide positive feedback to these enquiries.

Key monitoring measures are set out Table 9.1 below.

Table 9.1. Key monitoring measures

Topic	Indicator	Method	Periodicity	Location
Grievances/ Concerns	SASA will review Grievance Log/Database, including complaints <i>closed</i> and <i>unresolved</i> per period at a minimum monthly to include: <ul style="list-style-type: none"> • number of outstanding complaints and grievances opened in the month, • number of complaints and grievances opened in the month and evolution since Project start (graphic presentation), • number of complaints grievances closed in the month; and • type of grievance. 	Grievance Records	Monthly	Site office
Visitor to the Office	Visitors will be recorded including the information of the reason for visit etc.	Visitor Records	Monthly	Site office

Stakeholder Engagement Plan (SEP)

Topic	Indicator	Method	Periodicity	Location
Community Engagement Activities	The SRS will record formal and informal engagement with local communities.	Community Engagement Records	Quarterly	Site office
Disclosure Materials and Feedback to Communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities.	Community Info System on the Website	Quarterly	Site office
Social Responsibility Program	SRS will monitor and record the social responsibility activities carried out in the scope of SASA Project and these records will be inserted to stakeholder engagement quarterly reports.	Annual reports	Bi-annually (construction) Annually (operation)	Site office

9.2 Key Performance Indicators (KPIs)

The key performance indicators (KPIs) will be used to assess the progress and effectiveness of proposed mitigation strategies. The KIPs are given in Table 9.2 below.

Table 9.2. Key performance indicators

KPI	Target	Monitoring Measures
Total number of community complaints or grievances	Total number reduced year on year	Grievance Database
% of complaints that are responded within 5 days	Delivery of regular reports to stakeholders on the outcomes of the Grievance Mechanism	Reporting
% of complaints that are closed within 30 days.	Target of 100%	Grievance Database
Auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed.	Bi-annual (construction), annual (operation) audit complete target of 100% of grievances close out to satisfaction of complainant within 30 days.	Audit Report

10 TRAINING

All necessary training will be provided as induction training to provide general awareness for all employees of the Project and its contractors. Job-specific training will be also provided as necessary including grievance management. The implementation of this grievance mechanism will be followed by the Social Responsibility Staff and other personnel and supervisors of SASA. Contractors are also involved in or overseeing activities with local communities.

11 AUDIT AND REPORTING

Internally, conformance of this SEP will be monitored in accordance with the requirements of the SASA.

Contractors will be subject to inspection and audit in accordance with the requirements of the SASA.

Conformance with this plan will be subject to periodic assessment by SASA corporate audit and assurance programs and separately by Project Lenders.

11.1 Record Keeping and Reporting

Record keeping will be done during the following cases:

- Consultation meetings,
- Community engagement activities,
- Grievances actions and close out of grievances,
- Concerns/opinions/suggestions by the local community during consultation meetings and stakeholder engagement activities,
- New on press and interviews,
- Audits, investigations and incidents which will be managed according to SASA procedures.

On monthly basis, an overview of the grievances recorded in terms of number and type will be investigated. The situation of the grievances as open/closed out will be developed periodically. The Social Responsibility Staff will evaluate and conclude this overview with project management in the monthly progress meetings.

Within the scope of the SEP, Wish, Complaint and Suggestion Follow-up and Evaluation Procedure (KG-II-PR-001), Opening Wish, Complaint and Suggestion Boxes and Follow-up Report (KG-II-FRM-036), Individual Wishes, Complaints and Suggestions Evaluation Form (KG-I-I-FRM-044) , Meeting Registration Form and Wish, Complaint and Suggestion Registration Form (KG-II-FRM-047) are the Grievance Mechanism Record Documents of Sasa.

REFERENCES

Applicable Turkish Standards

- Turkish EIA requirements,
- The Constitution of the Republic of Turkey
 - ARTICLE 25. (VII. Freedom of Thought and Opinion),
 - ARTICLE 26. (VIII. Freedom of Expression and Dissemination of Thought),
 - ARTICLE 56. (Health Services and Conservation of the Environment),
 - ARTICLE 63. (XI. Conservation of Historical, Cultural and Natural Wealth),
 - ARTICLE 74. (VII. Right of Petition),
 - Civil Law No. 4721 (issued on 08.12.2001, Official Gazette No. 24607). Provisions of Turkish Civil Law will be considered and met in all phases of the Project,
 - Law on Right to Information numbered 4982 and issued on 24.10.2003 with the official gazette number of 25269,
 - Law on the Use of Right to Petition No. 4982 which was issued on 01.11.1984 with the official gazette number of 3071,
 - Another Law related to the involvement of stakeholders to the Project is the Expropriation Law No: 2942 (Issued on 04. 11. 1983, Official Gazette No: 18215),
 - Expropriation Law No. 2942 (issued on 08. 11. 1983, Official Gazette No. 18215),
 - Turkish Environmental Legislation is the Environmental Law No. 2872 (Issued on 11.08.1983, Official Gazette No.18132, amended by Law No. 5491).

Applicable international standards and guidelines

- IFC: Performance Standard 1 (PS1)

Applicable SASA standards, policies and procedures

- Wish, Complaint and Suggestion Follow-up and Evaluation Procedure (KG-II-PR-001),
- Opening Wish, Complaint and Suggestion Boxes and Follow-up Report (KG-II-FRM-036),
- Individual Wishes, Complaints and Suggestions Evaluation Form (KG-I-I-FRM-044),
- Meeting Registration Form and Wish, Complaint and Suggestion Registration Form (KG-II-FRM-047).